

Message (Digitally Signed)

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**From:** Jeffrey H Birk [jeffrey.birk@basf.com]  
**Sent:** 10/27/2020 1:00:27 AM  
**To:** Schmid, Emily [Schmid.Emily@epa.gov]  
**CC:** Robert Yee [robert.yee@basf.com]  
**Subject:** Re: [EXT] RE: Revised proposed Engenia herbicide labeling  
**Attachments:** smime.p7s

Emily thanks I just spoke with Dan and I will have the change made in the morning and get a clean copy to you.

Jeff

Sent from my iPhone

On Oct 26, 2020, at 20:27, Schmid, Emily <Schmid.Emily@epa.gov> wrote:

Hi Jeff,

In the nonsensitive crops and areas section on page 14, you can add, "Areas of bare ground from recent plowing or grading that are contiguous with the treated field" if you'd like.

Let me know if you'd like to make that change and if so, if you could get a revised label to me soon, that would be really appreciated.

Thanks,  
Emily

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**From:** Jeffrey H Birk <jeffrey.birk@basf.com>  
**Sent:** Monday, October 26, 2020 7:42 PM  
**To:** Schmid, Emily <Schmid.Emily@epa.gov>  
**Cc:** Robert Yee <robert.yee@basf.com>  
**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

Emily,

Yes, that would be great. I'll be checking for any updates.

Thanks for the help,

Jeff

**JEFFREY BIRK**  
Product Registration Manager

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Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States  
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BASF Corporation

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**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 5:34 PM  
**To:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>  
**Cc:** Robert Yee <[robert.yee@basf.com](mailto:robert.yee@basf.com)>  
**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

Hi Jeff,

Thanks for making the quick change. I think Bayer is still negotiating on some of the language so if they have additions, I'll let you know. I don't think there is anything else you'll be required to change, but I want to give you the opportunity to make the same changes if you want to.

Thanks again,  
Emily

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**From:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>  
**Sent:** Monday, October 26, 2020 3:57 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Robert Yee <[robert.yee@basf.com](mailto:robert.yee@basf.com)>  
**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling


Emily,

I have made three changes and include the annotated label so you can confirm the changes. I think this is it, or at least hope so.

Thanks for the help,

Jeff

**JEFFREY BIRK**  
Product Registration Manager

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**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 3:06 PM  
**To:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>  
**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

That's fantastic. Thank you!

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**From:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>  
**Sent:** Monday, October 26, 2020 3:01 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

Emily, I will revised. Back to you soon,

Jeff

**JEFFREY BIRK**

Product Registration Manager

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**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Sent:** Monday, October 26, 2020 2:58 PM

**To:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>

**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

Something like this would be fine too:

Pre-harvest interval: 7 days

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**From:** Schmid, Emily

**Sent:** Monday, October 26, 2020 2:57 PM

**To:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>

**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

Hi Jeff,

I had suggested something like, "Allow at least 7 days between final application and harvest" to be added under "DT Cotton Restrictions". This was what HED had assessed so we were asking the registrants to add it. You already had it as part of your soybean section so that part is okay.

Are you opposed to adding it? If you don't want to because you feel it doesn't make sense with timing, let me know. Otherwise, it would be great to be done with the label.

Let me know what you think.

Thank you,  
Emily

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**From:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>

**Sent:** Monday, October 26, 2020 2:49 PM

**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Subject:** RE: [EXT] RE: Revised proposed Engenia herbicide labeling

We discussed it, but reached no conclusion. Not sure that there is any opportunity to harvest DT cotton any place in the US by August 7.

Is this the statement that you are referring to?

DO NOT apply harvest aid application of Engenia within

7 days of harvest.

**JEFFREY BIRK**

Product Registration Manager

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Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States

<image001.png>

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**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 2:42 PM  
**To:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>  
**Subject:** [EXT] RE: Revised proposed Engenia herbicide labeling

Hi Jeff,

This label looks great! The only thing is the PHI wasn't added to the cotton restrictions. Did Dan and Marietta discuss that change with you?

Thanks,  
Emily

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**From:** Jeffrey H Birk <[jeffrey.birk@basf.com](mailto:jeffrey.birk@basf.com)>  
**Sent:** Monday, October 26, 2020 2:13 PM  
**To:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Hathaway, Margaret <[Hathaway.Margaret@epa.gov](mailto:Hathaway.Margaret@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; John Sedivy <[john.sedivy@basf.com](mailto:john.sedivy@basf.com)>; Robert Yee <[robert.yee@basf.com](mailto:robert.yee@basf.com)>  
**Subject:** Revised proposed Engenia herbicide labeling

Dan,

Attached is the clean and hopefully final version of the proposed Engenia herbicide labeling. I have also attached an annotated version of the label that was used to make the most recent changes.

@Emily, there are several changes that I have made since the last label that you reviewed. These changes were only made for consistency of terminology throughout the label such as changing neighboring to adjacent and changing agent to adjuvant.

As always let me know if you have any question or require additional changes.

Thanks for your cooperation in working through this lengthy process.

Jeff

**JEFFREY BIRK**

Product Registration Manager

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